

## REMARKS

Claims 1-22 were pending, examined, and rejected. Applicants respectfully request reconsideration and favorable action in this case.

### **Rejections under 35 U.S.C. §101**

Claims 1 and 17-22 were rejected by the Examiner under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Applicants have amended to recite computer program product language. Applicants believe that the amended claims are directed to statutory subject matter and respectfully request the Examiner to withdraw the rejection.

### **Rejections under 35 U.S.C. §102**

Claims 1-22 were rejected by the Examiner under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,269,153, issued to Carpenter *et al.* ("Carpenter"). Applicants respectfully traverse and submit the cited art does not teach all of the elements of the claimed embodiment of the invention.

With respect to Claim 1, Applicants submit that Carpenter does not teach, for example, determining whether a natural language caller utterance includes an action and determining whether the natural language caller utterance includes an object. The Office Action states that these elements are taught by FIG 2 and related text of Carpenter. Applicants disagree.

The relevant portion of the cited reference states:

The voice recognition unit 204 passes the text to the routing module 206, which attempts to appropriately route the call to one of a plurality of possible destinations 218A . . . N, based on analysis of the text received from the voice recognition unit 204. The routing module generates a set of candidate destinations which is a subset of the possible destinations 218A . . . N. If the routing module 206 is unable to generate a set of candidate destinations, the routing module 206 passes the call to the human operator 214. If the routing module 206 is able to generate a set of candidate destinations, but is unable to reduce the set to a single unique destination, the routing module passes the call to the disambiguation module 208. The disambiguation module 208 further disambiguates the candidate destinations by creating disambiguating questions for the caller 216 and using the responses of the caller 216 to further distinguish between the candidate destinations.

Applicants submit that Carpenter's non-specific description of analyzing text to identify a set of candidate destinations and invoking a disambiguation module if unable to determine a single unique destination does not anticipate claim language reciting determining whether a caller utterance includes an object and determining whether the caller utterance includes an action because Carpenter does not teach either expressly or inherently either of these distinct elements. Whereas Claim 1 distinguishes between actions and objects for purposes of determining a routing, Carpenter contains no such distinction and entirely fails to teach or suggest the benefits of analyzing speech based on the action-object concept.

Applicants submit, therefore, that because Carpenter does not teach expressly or inherently all of the claim elements, the anticipation rejection of claim 1 is improper and Applicants respectfully request the Examiner to reconsider and withdraw the rejection.

Analogous arguments apply to the anticipation rejection of Claim 2. Applicants specifically note with respect to claim 2 that the scoring matrix 212 of Carpenter does not anticipate the action-object matrix recited in Claim 2 where the scoring matrix is expressly described as a term-document frequency, which is defined as a matrix whose rows represent m terms, whose columns represent n destinations, and where an entry  $A_{t,d}$  is the frequency with which term t occurs in calls to destination d.

With respect to Claim 7, the claim has been canceled and Claim 8 has been rewritten in independent form to incorporate the limitations of Claim 7. With respect to Claim 17, the claim has been canceled and Claim 19 has been rewritten in independent form to incorporate the limitations of Claim 17. The anticipation rejection of Claims 8 and 19 is improper for reasons analogous to those presented above with respect to Claim 1.

### CONCLUSION

Applicants believe this response includes a reply to each ground of objection and rejection. Applicants respectfully request reconsideration of the pending claims.

Applicants believe no fee is due in connection with this response. If, however, fees are required, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 10-0096 of Jackson Walker L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.236.2019.

Respectfully submitted,  
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